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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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Washington County Consolidated Communications Agency

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April 2, 1993

Office of the Secretary  
Attn: Federal Communications Commission  
Washington, D.C. 20554

FCC MAIL ROOM

**RE: PR Docket 92-235 - Refarming**

Dear Commissioners:

As a Public Safety Agency representing 19 jurisdictions in Washington County, we are adversely affected by the migration plan, as proposed in PR Docket 92-235, and feel it is unrealistic. Because of safety issues and life threatening situations that are dealt with everyday, our radio system coverage cannot be any less than we now have. As proposed in 92-235, reduced deviation and reduced power on our hilltops is necessary and the only way to assure adequate coverage is to increase the number of hilltop radio sites. This not only is economically impossible, but any new license after the effective date must meet new narrowband requirements. Our existing systems in Washington County would not be compatible with the narrowband equipment at the new sites. There is no apparent graceful migration path or means for old equipment to communicate with new 5.0/6.25 KHz equipment, thus necessitating complete change of our entire systems. It would be economically impossible for our public safety agencies to change at one time.

We realize the increased need for spectrum efficiency, but while increases in spectrum efficiency are important, land mobile communications require a very high quality of service. The quality requirement is generally higher for public safety services and must not be compromised for the sake of spectrum efficiency.

Docket 92-235 appears to prohibit mobile relay operations in the 150-174 MHz band for the public safety services. This again reduces coverage, which will be costly and prohibit car-to-car communications over a large area. Again, this will be an officer safety issue.

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Another issue is that public safety paging will be negatively impacted in 1996 by power and deviation reduction. Commercial paging frequencies are grandfathered at 5 KHz necessitating development of a special product just for the vital purpose of alerting emergency police, medical and especially fire personnel. This will mean higher costs if pagers are even available after 1996.

Because industry does not yet manufacture equipment capable of meeting the proposed requirements, and the cost of trying to use existing equipment and make the radical changes needed to meet the FCC Docket 92-235, we believe 1996 is too short a time to try and implement such a drastic change. A delay until the year 2004 would solve a lot of problems and allow for a more reasonable period to budget for the change.

There are other concerns about the technical aspect of how the radios will work, but we will leave these to more knowledgeable people to give their comments. We do agree with APCO's comments, which you have received, and encourage you to work with APCO and the APCO 25 Committee.

Sincerely,

  
Diane Brandt  
Director

cc: APCO  
State of Oregon, Emergency Management  
Oregon Congressmen/Senators